

March 19, 2025

VIA ECF

The Honorable Lewis J. Liman
Danial Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Lively v. Wayfarer Studios LLC, et al.*, Case No. 1:24-cv-10049-LJL;
Unopposed Motion to Redact and Seal Personal Medical Information

Dear Judge Liman,

We represent Defendants Jed Wallace and Street Relations, Inc. Under Local Rule 7.1(e) and the Court's Individual Practices in Civil Cases 1.C, we write to request the Court allow to file redacted and sealed copies of documents. In Wallace's and Street's Memorandum of Law in Support of their Rule 12 Motion and Motion to Transfer Venue and the accompanying Jed Wallace declaration, both documents will contain sensitive personal medical information about Mr. Wallace. **This letter motion is unopposed.** See Liman Individual Practices 1.C ¶3.

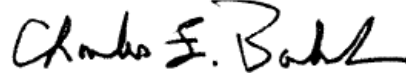
"Personal medical information implicates significant privacy interests that overcome the strong presumption of public access[.]" *Thor Equities, LLC v. Factory Mut. Ins. Co.*, No. 20 CIV. 3380 (AT), 2023 WL 6382684, at *1 (S.D.N.Y. Sept. 29, 2023); *Hanks v. Voya Ret. Ins. and Annuity Co.*, No. 16-CV-6399 (PKC), 2021 WL 2451981, at *2 (S.D.N.Y. June 16, 2021) ("protecting personal medical information outweigh[s] the public's right to access this information [when the redactions are] narrowly tailored."). But see *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 121 (2d Cir. 2006) ("Where documents are used to determine litigants' substantive legal rights, a strong presumption of access attaches."). The Court and parties here already view information like this as Attorneys' Eyes Only information under this case's protective order. See Dkt. 125 (Protective Order) ¶1.c ("The following categories of information may be designated 'Attorneys' Eyes Only': . . . c. Medical information of parties or third parties[.]").

What is sealed will be limited, tailored only to personal medical information. In the Memorandum, we redact one paragraph—less than 1% of the memorandum, 46 words out of about 6600 words in the body—dedicated to Mr. Wallace's condition. For Mr. Wallace's declaration, we redact only the paragraphs that describe his health issues.

Accordingly, we respectfully ask the Court grant this *unopposed* letter motion to seal and redact Mr. Wallace's personal medical information in Mr. Wallace's Memorandum of Law in Support of his Rule 12 Motion to Dismiss and Transfer Venue and Mr. Wallace's declaration.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles L. Babcock". The signature is fluid and cursive, with the first name "Charles" and last name "Babcock" clearly distinguishable.

Charles L. Babcock

SDNY #5451117

Joel R. Glover

SDNY #5697487

JACKSON WALKER LLP

1401 McKinney, Suite 1900

Houston, TX 77010

(713) 752-4200

cbabcock@jw.com

jglover@jw.com

cc: all counsel of record (via ECF)